

## REMARKS

Reconsideration of this application as amended is respectfully requested.

In the Office Action dated March 30, 2004 claims 1-32 were pending. Claims 1, 4-6, 8-9, 12-14, 16-17, 20-22, 24-25, 28-30, and 32 were rejected under 35 U.S.C. § 102(e) as being anticipated by Chin et al. U.S. No. 2001/002455 A1. Claims 2-3, 7, 10-11, 15, 18-19, 23, 26-27 and 32 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Chin et al., in view of Komissarchik et al., U.S. No. 5,799,276.

In this response, no claim has been cancelled. Claims 1-3, 5-6, 8-11, 13-14, 16-19, 21-22, 24-27, 29-30, and 32 have been amended. No new matter has been added.

Claims 1, 4-6, 8-9, 12-14, 16-17, 20-22, 24-25, 28-30, and 32 were rejected under 35 U.S.C. § 102(e) as being anticipated by Chin. In view of the foregoing amendments, it is respectfully submitted that claims 1-32 include limitations that are not disclosed by the cited references. Specifically, independent claim 1 as amended recites as follows:

1. A method comprising:  
converting a search term in a search request to one or more canonical phonetic forms based on similar pronunciation of the search term;  
performing a phonetic keyword search for each canonical phonetic form of the search term; and  
generating an indication of search results based, at least in part, on the phonetic keyword search.

(Emphasis added)

Independent claim 1 includes converting a search term into one or more canonical phonetic forms based on similar pronunciation of the search term and performing a phonetic keyword search for each of the canonical phonetic form. It is respectfully submitted that the above limitations are absent from the cited references.

Rather, Chin is related to multilingual translation from one language to another language (see, Abstract of Chine). The Examiner contended that paragraph 164 of Chin reads on converting a search term into one or more canonical phonetic forms.

Applicant respectfully disagrees. Paragraph 164 of Chin is related to a cache function “by grouping phrases that have similar meanings and then associates a single canonical phrase with each group” (emphasis added). It is respectfully submitted that such grouping does not convert a search term into one or more canonical phonetic forms. Rather, it merely stores translation text of multiple languages supported in a database grouped under a canonical phrase. Specifically, Chine states:

“When performing a translation on any of those phrases, the cache returns the translation of that canonical phrase. The cache includes a database table of canonical phrases across all supported languages and a series of hashtables for each supported language. These are canonical phrases that have a version in every supported language.”

(Page 9, paragraph 164 of Chin, emphasis added)

Thus, the original phrase is translated into one of those phrases (e.g., a one-to-one match dependent upon the target language) and the translation is based on the exact spelling of the original phrase.

In addition, the canonical phrase of Chin is not the same as canonical phonetic forms of the present invention as claimed. A phonetic form is related to a sound or pronunciation of a term. The text translation of Chin does not relate to pronunciation of the text being translated and the translation is not performed based on the pronunciation of the text, particularly, the similar pronunciation (e.g., may or may not be the exact pronunciation) of the text.

In contrast, the present invention as claimed includes converting a search term of a search request into one or more canonical phonetic forms based on the similar pronunciation of the search term. That is, even though a search term may be misspelled, the search is performed

based on the similar pronunciation of the misspelled term. As result, a correct search result is more likely found. Therefore, for the reasons discussed above, it is respectfully submitted that independent claim 1 is not anticipated by Chin.

Similarly, independent claims 9, 17, and 25 include limitations similar to those recited in claim 1. Thus, for the reasons similar to those discussed above, it is respectfully submitted that claims 9, 17, and 25 are not anticipated by Chin. Given that the rest of the claims depend from one of the above independent claims, it is respectfully submitted that the rest of the claims are not anticipated by Chin.

Claims 2-3, 7, 10-11, 15, 18-19, 23, 26-27 and 32 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Chin in view of Komissarchik. Komissarchik is related to a speech recognition system that translates an input speech to text (see, Abstract of Komissarchik). Komissarchik does not take text as an input (e.g., a search term), convert the text into one or more canonical phonetic forms based on the similar pronunciation, and perform a text search based on the converted canonical phonetic forms. Therefore, at least for the reasons similar to those discussed above, claims 1-32 are patentable over Chin in view of Komissarchik.

Furthermore, there is no suggestion within the cited references to combine Chin with Komissarchik. Chin is related to a text-to-text multilingual translation, while Komissarchik is related to a speech recognition system. Chin does not take speech as an input and require any speech recognition during the translation and Komissarchik does not take text as an input when performing speech recognition. It is respectfully submitted that one with ordinary skill in the art would not, based on the teachings of Chin and Komissarchik, to combine these two references, because such a combination lacks a reasonable expectation of success.

Even if they were combined, such a combination still lacks the limitations set forth above. Therefore, it is respectfully submitted that claims 1-32 are patentable over Chin in view of Komissarchik. Withdrawal of the rejections is respectfully requested.

In view of the foregoing, Applicant respectfully submits the present application is now in condition for allowance. If the Examiner believes a telephone conference would expedite or assist in the allowance of the present application, the Examiner is invited to call the undersigned attorney at (408) 720-8300.

Please charge Deposit Account No. 02-2666 for any shortage of fees in connection with this response.

Respectfully submitted,

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